

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

Marinella Hemenway et al v. Islamic Republic of Iran, No. 1:19-cv-11767 (GBD) (SN)

DECLARATION OF FAMILIAL RELATIONSHIP

I, Joseph W. Dixon, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is Joseph W. Dixon, and I am the stepfather of DaJuan Hodges (“DaJuan”), who died on September 11, 2001 (“9/11”) when the World Trade Center collapsed. I submit this Declaration in order to demonstrate I was the functional equivalent of DaJuan’s father.

2. I met and began dating DaJuan’s mother, Pamela Hodges (now Pamela Dixon) (“Pamela” or “Pam”) in 1975, when I was twenty-one and DaJuan was three years old. My Dad told me at that time that if I was serious about this girl (Pamela), then I have to be serious about her son (DaJuan) too. I was exactly that until the end.

3. When Pam and I met, I worked in construction, and Pam worked at New York Life. We are both retired now. Prior to her retirement, Pam worked for 29 years at Marsh & McLennan, Inc. (the professional services firm) in Manhattan.

4. DaJuan’s biological father is named Roger Shepard. He played almost no part in DaJuan’s life, and no part at all as far as financial support. My wife Pam and I got everything that DaJuan needed, and Pam’s mom (now deceased) was also very generous with DaJuan.

5. Roger lived in Pam's mom's neighborhood. He had an issue with drugs and no job. When DaJuan was small, Roger would sometimes show up at Pam's mom's home to visit with DaJuan when Roger felt like it. Later, when DaJuan was older, he would sometimes accidentally run into Roger on the street. When that happened, Roger often asked DaJuan for money.

6. I do not call running into DaJuan on the street quality time. Roger never took DaJuan anywhere and never spent any real time with DaJuan. Roger never contributed a single penny to DaJuan's support. DaJuan called his biological father "Roger," but he called me "Daddy" or (later on) "Dad".

7. Pam and I moved in together shortly after we met, and we got married in 1978. (A copy of our marriage license is attached as Ex. A). DaJuan was the ring bearer at our wedding. We have been happily married for 44 years now. And from shortly after I first met Pam, I always treated and regarded DaJuan as my own son, and he always treated and regarded me as his Dad.

8. About a year after Pam and I got married, our son Sherard was born. Sherard was DaJuan's younger (by seven years) brother. We all lived together as a family, doing everything together. (I have attached copies of pictures of DaJuan, my wife Pam and myself at a birthday party we had for Pam when DaJuan was still a little boy as Ex B. I have attached as Ex. C a copy of a funny note Pam put together many years ago urging me, DaJuan and Sherard to do more to help her with housework; the note includes a photo collage of myself, DaJuan and Sherard. Some other family pictures are annexed as Ex. D.) Our apartment was located on 112th Street in Harlem. Pam and I each worked hard to support DaJuan and Sherard and to give them

everything they needed to learn and to grow. Together, we paid the rent on our apartment and provided DaJuan and Sherard with food, clothes, and all the necessities of life.

9. Once I met Pam, my family became DaJuan's family too. My father (also named Joseph Dixon) was still alive when DaJuan was a small boy, and he and DaJuan loved to spend time together. Often, after DaJuan visited with my Dad for a weekend, my Dad would ask me – only half-kidding – “Can I just keep him [DaJuan]?”

10. I have many, many wonderful memories of our life together. We lived together under one roof, and though our mornings were often a little rushed, we made sure to have dinner together. Pam and I took turns helping the boys with their homework from school. We went to church together on Sundays (until the boys became teenagers and were less willing to go to church). I enjoyed playing Nintendo and other video games with both boys. One particularly sweet memory I have has to do with DaJuan's birthday. By coincidence, DaJuan and I had the same birthday. So, every year we would share our birthday party, and for many years when DaJuan was small, he insisted that we were somehow the same age. When DaJuan got a little older, every Sunday I would take DaJuan and his friends to play football in the park while Pam made our family's Sunday dinner. Our whole family enjoyed supporting Sherard's career as a rapper. (Sherard had a fairly successful career in rap and went by the rap name “Posta Boy”.) If you look carefully at the shows that Sherard did on BET TV when he was starting out his career, you can always see DaJuan.

11. DaJuan worked part-time at Colgate-Palmolive during the school year and full-time during the summer while he was still in school. He often worked with me on construction jobs on weekends too, but he preferred office work. Once he was out of school, he got a job working full time at Marsh & McLennan, Inc.

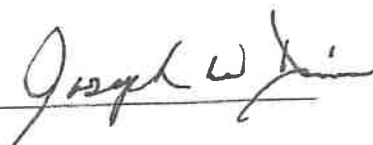
12. Pam worked at Marsh & McLennan's midtown offices for 29 years, and she also helped to set up her group from Marsh's office at the World Trade Center. That is where DaJuan was working when he was killed on 9/11.

13. DaJuan's daughter, Jatair, is now 28 years old. DaJuan, Jatair and Jatair's mother stayed with us for a time when Jatair was a baby. After raising our two boys, Pam and I were crazy about having a little girl in the family. And, to be frank, we spoiled her rotten as a child, buying her all her clothes and toys. I remember some of our friends warning us to be careful about how much we did for our new granddaughter Jatair, or else we were going to wind up being homeless. Jatair still comes to see us often, and she calls us Nana and Pop-Pop. (A picture of myself, Sherard and Jatair as young girl is attached as Ex. E.)

14. The last time I saw DaJuan was about a week before September 11. The two of us went out for dinner at Fuddrucker's and had a nice time. I was proud that he was a good son, and that he had now become a good, hard-working father to Jatair too.

15. When I woke up on September 11, 2001, I could not even imagine that I would never see my beloved boy DaJuan again. He was my son in every important sense of that word. His mother and I feel the pain of his loss every day. So too does his brother Sherard. I believe that I should be considered as the functional equivalent of DaJuan's father.

Executed on: 6/28/22

Name (Signature): 

Name (Print): Joseph W. Dixon

EXHIBIT A

Marriage License for Joseph Dixon



THE CITY OF NEW YORK — OFFICE OF THE CITY CLERK
MARRIAGE LICENSE BUREAU
CERTIFICATE OF MARRIAGE REGISTRATION
THIS CERTIFICATE IS
VOID IF ALTERED OR SEAL NOT IMPRINTED

INDEX-1978
No 10379
MANHATTAN

THIS IS TO CERTIFY THAT Joseph Willie Dixon Jr.
residing at 551 Manhattan Ave New York, NY born February 26, 1954
at Baltimore MD USA and Pamela Hodges
residing at 21 West 112th St New York, NY born July 19, 1954
at New York NY USA WERE MARRIED ON June 24, 1978
at New York, New York as shown by the duly registered license and certificate of marriage
of said persons on file in this office. Dated, issued and sealed at the office of the City Clerk, Borough of Manhattan.
Date Aug. 3, 1978
FACSIMILE SIGNATURE AND SEAL ARE IMPRINTED PURSUANT TO
SECTION 11-A, DOMESTIC RELATIONS LAW OF NEW YORK

David N. Dinkins
David N. Dinkins
City Clerk of the City of New York

State ID for Joseph Dixon

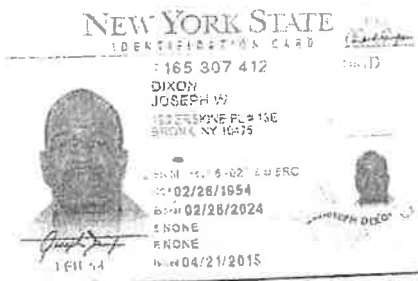


EXHIBIT B

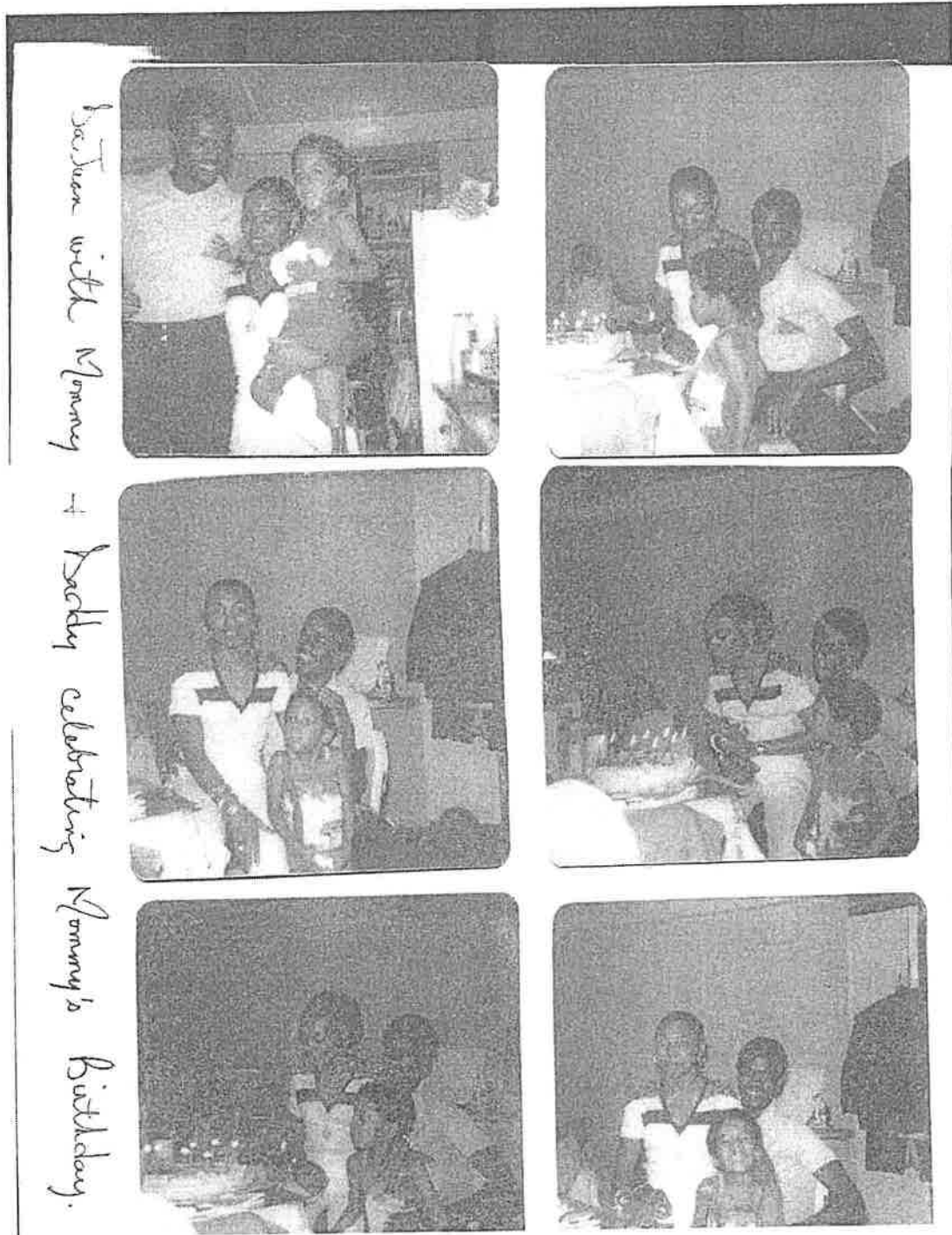


EXHIBIT C

MISSION POSSIBLE



Your mission, Dixon people, should you decide to accept it: You must understand & perform the following:

Your BOSS (Mother/Wife) DOESN'T work here - Unfortunately, you MUST clean and pick-up after yourself.

WARNING!

You will immediately self-destruct if this mission is not carried out.

From,

P.retty D.etermined

EXHIBIT D



DaJuan + Daddy
@ a wedding



DaJuan
+ Daddy +
Baby Brother
Sherard
spending
quality time.

DaJuan w/ Daddy;
Mommy + Grandma
on Halloween.



EXHIBIT E

